

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: ANADARKO PETROLEUM
CORPORATION SECURITIES
LITIGATION

Case No. 4:20-cv-576

District Judge Charles R. Eskridge III

CLASS ACTION

**JOINT MOTION FOR LEAVE TO FILE FOUR EXHIBITS TO SUMMARY
JUDGMENT AND DAUBERT BRIEFS UNDER SEAL**

The Parties¹ hereby jointly move for the Court's approval to file certain exhibits to Defendants' summary judgment motion and certain exhibits to the Parties' *Daubert* motions under seal.

WHEREAS, on March 16, 2023 the Parties jointly moved "for the Court's approval to file Defendants' summary judgment brief and the exhibits to the summary judgment brief and the Parties' *Daubert* briefs, under interim seal" (ECF No. 159) for a

¹ The Parties refer to Class Representatives Norfolk County Council as Administering Authority of the Norfolk Pension Fund and Iron Workers Local #580 Joint Funds, on behalf of themselves and the Class (collectively, "Plaintiffs"), and defendants Anadarko Petroleum Corporation, R.A. Walker, Robert G. Gwin, Robert P. Daniels, and Ernest A. Leyendecker, III (collectively, "Defendants").

period of three weeks to review the large number of exhibits and propose appropriate redactions pursuant to the Parties' Protective Order (ECF No. 80);

WHEREAS, the Court granted the Parties' joint motion on March 17, 2023 and instructed the Parties moving to seal to "file a motion to seal attaching proposed redacted copies pursuant to the procedure outlined in Section 12(b) of the Court's Procedures" (ECF No. 169);

WHEREAS, pursuant to Section 12(b) of the Court's Procedures, the Parties jointly move to seal and attach proposed redacted copies of:

- a. Defendants' Exhibit 25 to ECF No. 166 and Plaintiffs' Exhibit A to ECF No. 161, which contain personal identifying information of Defendants' expert, including his home address and cell phone number, and which contain confidential business information of a third party, ConocoPhillips Company, who has requested that the Parties file these exhibits with certain redactions;
- b. Defendants' Exhibit 121 to ECF No. 166 and Plaintiffs' Exhibit 1 to ECF No. 157, which contain personal identifying information of Defendants' expert, including his home address;

WHEREAS, the Parties will publicly file all of the motions and remaining exhibits that were filed under seal pursuant to ECF No. 159;

NOW, THEREFORE, the Parties hereby stipulate and agree to the aforementioned redactions for the Parties' March 16 motions to the Court, and jointly request that the Court grant the Parties' motion.

Dated: April 6, 2023

Respectfully submitted,

/s/ Kevin J. Orsini

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CERTIFICATION OF WORD COUNT

In accordance with Rule 18(c) of Your Honor's Court Procedures, I hereby certify that this document contains 364 words, exclusive of the caption and the signature block.

Dated: April 6, 2023

/s/ Kevin J. Orsini

Kevin Orsini

CERTIFICATE OF SERVICE

I certify that on April 6, 2023, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

Dated: April 6, 2023

/s/ Kevin J. Orsini

Kevin Orsini